

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JAMES ALLEN,)	
)	
Plaintiff,)	
)	
v.)	
)	CAUSE NO.: 1:22-cv-03044
CITY OF CHICAGO,)	
Special Representative of the Estate of)	
Former Chicago Police Detective)	
MICHAEL POCHORDO, deceased,)	
Special Representative of the Estate of)	
Former Chicago Police Detective)	
GEORGE ROTKVICH, JR., deceased,)	
Former Chicago Police Sergeant)	
JOHN E. TOENINGS, former)	
Cook County ASA RICHARD BEUKE,)	
former Cook County State's Attorney's)	
Office Investigator NORFIE DICIOLLA,)	
deceased, and COOK COUNTY,)	
)	
Defendants.)	

JOINT STATUS REPORT

Come now, the parties, by respective counsel, and for their Joint Status Report respectfully state as follows:

1. On September 21, 2022, this Court stayed this action pending the outcome of Plaintiff's post-conviction relief proceedings in a related criminal case. (*See* Circuit Court of Cook County-Criminal Division Case No. 84 C 009282; Appellate Court of Illinois-First Dist. Case No. 1-21-0404) (*See also* Doc. No. 34, September 21, 2022 Order Staying Proceedings).
2. On September 1, 2023, the Appellate Court of Cook County (1st Dist.) affirmed the trial court's decision to deny Plaintiff's Motion for Leave to File his Successive Post-Conviction Petition in Case No. 84 C 009282.

3. On October 5, 2023, Plaintiff filed a Petition for Leave to Appeal the September 1, 2023 Order of the Appellate Court of Illinois in the Illinois Supreme Court.

4. Ultimately, Plaintiff's Petition for Leave to Appeal the First District's September 1, 2023 order was denied.

5. Currently, the parties are engaging in discussions that may result in a withdrawal of Plaintiff's counsel or a voluntary dismissal of the action. The parties request that the Court stay the case an additional thirty (30) days to resolve these pending issues.

Respectfully submitted,

<u>/s/Chester L. Cameron, Jr.</u> Chester L. Cameron, Jr. Samuel R. Carl Brennan B. Hutson Jon F. Erickson Midwest Injury Lawyers, LLC 155 N. Wacker Drive, Suite 4250 Chicago, IL 60606 Attorneys for Plaintiff, James Allen	<u>/s/ Kenneth M. Battle</u> Kenneth M. Battle Herbert L. Stride O'Connor & Battle, LLP 111 W. Jackson Blvd. Chicago, IL 60604 Attorneys for Defendants, Norfie DiCiolla and Richard Bueke	<u>/s/Terrence M. Burns</u> Terrence M. Burns Paul A. Michalik Daniel M. Noland Reiter Burns, LLC 311 S. Wacker, Suite 5200 Chicago, IL 60606 Attorneys for Defendant, City of Chicago
<u>/s/Shneur Z. Nathan</u> Shneur Z. Nathan Avi T. Kamionski Warren Fasone Nathan & Kamionski LLP 33 W. Monroe, Suite 1830 Chicago, Illinois 6063 Attorneys for Defendants John E. Toenings, and Geri Yanow as the Special Representative for the Estates of Deceased Police Officers Michael Pochordo and George Rotkovich, Jr.	<u>/s/ Rebecca J. Laue</u> Rebecca J. Laue Cook Co. State's Atty.'s Office 500 Richard J. Daley Center Chicago, IL 60602 Attorney for Defendant, Cook County	